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Attorney for Defendant
Jason Toland

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON TOLAND

Defendant.

Case No. 2:24-CR-0099-DAD

AMENDED STIPULATION TO CONTINUE
SENTENCING HEARINGS; FINDINGS AND
ORDER

DATE: October 8, 2024

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

STIPULATION

1. By previous order, this matter was set for sentencing hearing on October 8, 2024.
2. By this stipulation, the defendant now moves to continue his sentencing hearing until November 5, 2024.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) On May 1, 2024, the government filed an Information against defendant. ECF No. 1. On May 13, 2024, the defendant waived Indictment and entered a guilty plea to a single count of Violation of 18 U.S.C. § 287 – False Claims Against the United States.
 - b) Due to delays in scheduling defendant's probation interview (attributable to both the probation officer's, defense counsel's, and defendant's respective schedules), defendant's

1 probation interview did not occur until August 16, 2024. Pursuant to Federal Rule of Criminal
2 Procedure 32, the probation officer and counsel, respectively, require time to draft and respond
3 to the presentence report, and to gather documents for use in drafting the presentence report.

4 c) The government does not object to the continuance.

5 d) Based on the above-stated findings, good cause exists to continue defendant's
6 sentencing hearing in this matter from October 8, 2024, to November 5, 2024.

7 e) This is the first request for continuance of sentencing.

8 f) The parties request the following modified disclosure schedule:

9 Draft PSR: September 24, 2024
10 Informal Objections: October 1, 2024
11 Final PSR: October 15, 2024
12 Corrections: October 22, 2024
13 Replies/Briefs: October 29, 2024

14 IT IS SO STIPULATED.

15 Dated: August 26, 2024

PHILLIP A. TALBERT
UNITED STATES ATTORNEY

16 /s/ Denise Yasinow
Denise Yasinow
Assistant United States Attorney

17 Dated: August 26, 2024

18 /s/ Candice L. Fields
Candice L. Fields
19 Counsel for Defendant
20 Jason Toland

21 **FINDINGS AND ORDER**

22 Pursuant to the stipulation of the parties and good cause appearing, the sentencing hearing of
23 defendant Toland is hereby continued to November 5, 2024 at 9:30 a.m.
24

25 IT IS SO ORDERED.

26 Dated: August 27, 2024

27 Dale A. Drozd
DALE A. DROZD
28 UNITED STATES DISTRICT JUDGE

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STIPULATION TO CONTINUE SENTENCING HEARING